

MICHAEL C. DELL'ANGELO / MANAGING SHAREHOLDER
d 215.875.3080 m 610.608.8766 | mdellangelo@bm.net

December 9, 2019

## VIA ECF

Honorable Lorna G. Schofield U.S. District Court Southern District of New York 40 Foley Square New York, NY 10007

RE: Contant, et al. v. Bank of America Corp., et al., No. 17-cv-3139

Dear Judge Schofield:

Plaintiffs submit this letter motion pursuant to Rule I.B.2 of the Court's Individual Rules and Procedures. Plaintiffs request an extension of the February 3, 2020, fact discovery deadline to April 13, 2020, and an extension of the related December 26, 2019 pre-motion letter deadline to March 6, 2020. Defendants consent to plaintiffs' request.

The Court previously granted one extension of the fact discovery deadline to February 3, 2020, and scheduled a related case management conference for January 9, 2020. ECF No. 258. The parties have not requested any additional fact discovery extensions.

Plaintiffs reserve the right to request a subsequent extension of the case deadlines if their ongoing discovery of third-party retail foreign exchange dealers is not concluded sufficiently in advance of those deadlines, or if an extension is otherwise warranted by the circumstances. Defendants reserve all rights with respect to further extensions.

Respectfully submitted,

/s/ Michael Dell' Angelo
Michael Dell' Angelo
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, PA 19103
Tel: (215) 875-3000
Fax: (215) 875-4604
mdellangelo@bm.net